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THUNDER PROPERTIES, INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

BANK OF AMERICA, N.A., )  
vs. )  
TENAYA CREEK HOMEOWNERS )  
ASSOCIATION; THUNDER PROPERTIES, )  
INC.; and GAYLE A. KERN, LTD. DBA )  
KERN & ASSOCIATES, LTD., )  
Plaintiff, )  
Defendants. )  
Case No. 3:16-cv-00158-MMD-WGC

**STIPULATION AND ORDER TO EXTEND TIME TO  
RESPOND TO MOTION FOR SUMMARY JUDGMENT**  
**(First Request)**

21 COMES NOW Plaintiff, BANK OF AMERICA, N.A., and Defendant, THUNDER  
22 PROPERTIES, INC., by and through their undersigned counsel, and hereby stipulate and agree  
23 as follows:

- 24 1. On November 1, 2017, Plaintiff filed a Motion for Partial Summary Judgment  
25 herein [ECF #57]. Responses are presently due on November 22, 2017.  
26 2. Defendant's counsel has been required to devote time and attention to numerous  
27 other pending legal matters since the filing of the Motion for Summary Judgment

which have detracted from the time available prepare a response. Specifically, Defendant's counsel is currently responding to approximately 15 summary judgment motions that have been filed in various cases over the course of the past several weeks. In addition, Defendant's counsel has had several appellate briefs due within the past several weeks and coming weeks.

3. Based upon the foregoing, Defendants have requested and shall be granted an extension of time until December 20, 2017, in which to respond to the Plaintiff's Motion for Summary Judgment.
4. This Stipulation is made in good faith and not for purpose of delay.

Dated this 22<sup>nd</sup> day of November, 2017.

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AKERMAN, LLP

13 /s/ Timothy E. Rhoda  
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*Bank of America, N.A.*

19 **IT IS SO ORDERED.**

20 By:   
21 Judge, U.S. District Court

22 Dated: November 27, 2017

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of November, 2017, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT** to the following parties:

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